Spain Comments on the recommendations to TRANSSC from the joint TRANSSC/WASSC Working Group (INF-12)

1. Conformity to future transport regulations with potential changes is an issue for Dual Purpose Casks (DPCs) waiting for future transportation. It is recommended to consider introducing a definition of DPC packages in the IAEA transport Regulations.

Comment: This definition would be needed only in case that some requirements of SSR-6 make finally specific references to this kind of package.

2. There should be a requirement or guidance in the IAEA transport regulations to consider ageing of packages that are intended to be stored for a long time before the transport.

Comment: Both recommendations are acceptable: Provisions should be developed to establish requirements related to programs of periodic surveillance of safety elements ("ageing management program") of the DPCs to check that all safety conditions remained and Guidance should be developed about those requirements advising on what kind of safety elements should be checked in the inspections program, the recommendable frequency of the inspections and the procedures for the checking. Any actions in that way should be consistent with the actions adopted by WASSC following the 1st recommendation given by the Working Group to the WASSC.

This issue should be considered during the present review cycle.

3. Any change of the IAEA transport regulations shall consider that in the section "Transitional Arrangements" in SSR-6 DPCs need to be considered in an appropriate manner so that they can be transported after storage. This applies to DPCs already fabricated and being used for storage of spent fuel.

Comment: Effectively, Transitional Arrangements should be considered although not only specifically focused in DPCs but for any type of package just prepared and transported after a long time of storage.

This issue should be considered during the present review cycle.

4. The key issue is how to maintain the DPC Safety Case (DPCSC) for transport during storage – recognizing that storage may be for an extended period of time – so that the DPC can be used for transport regardless of the period of storage. This requires periodic review of the DPCSC and periodic inspections of the DPC. In the review, the gap analysis should be made to identify any impact of changes of transport regulations to the DPCSC and to existing DPCs. Compensating arrangements, if necessary, should be proposed at that time. The gap analysis should consider changes in regulations and change in knowledge since the previous approval period. Therefore, it is
recommended to TRANSSC to develop an appropriate guidance material on this matter in TS-G-1.1 (SSG-26).

Comment: The periodic review of the safety case should be in fact carried out at least during the periodic renewal of the approval package certificate. In that sense a maximum valid period of the approval certificates should be recommended by the TSG.1.1, for example around two revision cycles of Regulations (6-8 years). The SSR-6 includes in Section VIII provisions on the content of the approval applications, however it does not consider the content of the application of an approval renewal. Regarding this, the recommendation of the Working Group for carrying out a ‘gap analysis’ of the package safety case to identify any impact of changes of transport regulations is not only adequate for the case of the DPCs but also for any type of package. Then, a possible change of the SSR-6 should be evaluated in order to include the minimum content of the application of an approval renewal, including the gap analysis recommended by the Working Group. In line with this some recommendation may also be included in the TS-G-1.1.

These issues should be considered during the present review cycle.

5. The transport regulations (SSR-6) should be reviewed with respect to the timespan between loading of the package and the completion of the shipment after storage to be consistent with the operation of a DPC, which will be transported more than a few decades after loading; e.g. it should be clarified that interpretation of para. 229 of the 2012 Edition of SSR-6 does not imply that the maximum allowable timespan for a transport postulated is less than one year.

Comment: See previous comments. Regarding the specific example of para. 229, it is considered that this paragraph only speaks about transport conditions and not about the storage of the packages. However, more clarification may be adequate.

This issue should be considered during the present review cycle.